

# EXHIBIT 2

Eldon Leaphart

May 14th, 2024

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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

IN RE: CHRYSLER PACIFICA FIRE  
RECALL PRODUCTS LIABILITY  
LITIGATION

Case No. 2:22-CV-03040-DML

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VIDEOTAPED DEPOSITION

DEPONENT: ELDON LEAPHART  
DATE: Tuesday, May 14, 2024  
TIME: 9:59 a.m.  
LOCATION: Remote Location  
REPORTER: Megan Walter, CSR-9352  
VIDEO: Alex Thompson  
Core Litigation Support, LLC, Firm-8546

Eldon Leaphart  
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1 repeat that again?

2 Q. (By Ms. Fitzpatrick): That wasn't a greet  
3 question I the way I phrased that.

4 What I'm asking is are you aware  
5 of -- do you have any knowledge of FCA being  
6 a -- having identified any other components in  
7 these two model years that are subject to the  
8 recall, any other components having some --  
9 having a fire risk, having the fire risk that  
10 is the source of this -- the subject of this  
11 recall?

12 MR. AZAR: Object to the form.

13 THE WITNESS: So the recall itself  
14 cites fire risk. The suspected component is  
15 the battery pack or one of the suspected  
16 components. But the fact that there is no  
17 conclusive root cause, and the fact that of the  
18 fourteen that are listed, HV battery is not  
19 conclusively the origin and cause for every  
20 single one of those fourteen, it leaves open  
21 the fact that there is potential for either the  
22 interaction between other components to be  
23 considered as factors. But certainly, the  
24 focus has been on the high voltage battery.

25 Q. (By Ms. Fitzpatrick): Well, I mean should

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1 consumers be worried because the only part that  
2 FCA's identifying to NHTSA as the source of  
3 this fire risk is this battery assembly pack,  
4 when it sounds like it's your opinion that it  
5 could be something else outside of that?

6 MR. AZAR: Object to the form.

7 THE WITNESS: Again, I'm getting back  
8 to what the recall is saying. I'm just getting  
9 back to the facts. The facts for the recall  
10 are, yes, there is a fire risk. Yes, the  
11 battery, high voltage battery is on the list of  
12 suspected components.

13 If we look at where this has  
14 occurred, of those fourteen vehicles, there  
15 are -- and I'm looking at one of the Bates  
16 documents that was listed. There are one, two,  
17 three, four, five -- seven. So fifty percent  
18 of these fourteen that are listed definitively  
19 say high voltage battery is where the fire  
20 started.

21 For the rest of them, it's unknown.  
22 And so from that standpoint, I cannot rule out  
23 that there may be other components that either  
24 directly or indirectly, and most likely it  
25 would be indirectly. Have some effect on an

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1 increased fire risk.

2 Q. (By Ms. Fitzpatrick): And isn't it also a fact  
3 that FCA is not identifying any other suspect  
4 components at this point in the Z11 recall,  
5 besides the pack -- go ahead.

6 MR. AZAR: Sorry. Finish your  
7 question. I thought you were done.

8 Q. (By Ms. Fitzpatrick): I trailed off, but isn't  
9 it a fact, because we're talking about facts  
10 here, that the FCA has not identified any other  
11 suspect component parts in its recall and  
12 communications with NHTSA, public  
13 communications with NHTSA?

14 MR. AZAR: Object to the form.

15 THE WITNESS: I boil that all under  
16 they have not declared a conclusive remedy. It  
17 does not eliminate the possibility that there  
18 is some system interaction with respect to  
19 modules that interface with the battery that  
20 could be implicated as root causes.

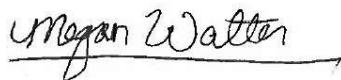
21 Q. (By Ms. Fitzpatrick): And that's fine that  
22 that's your position. But you -- but what I am  
23 asking is for you to confirm that FCA is not  
24 identifying any other suspect components in  
25 this recall.

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1 STATE OF MICHIGAN )

2 COUNTY OF OAKLAND )

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4 Certificate of Notary Public5 I certify that this transcript, consisting  
6 237 pages, is a complete, true, and correct record of the  
7 testimony of ELDON LEAPHART held in this case on May 14,  
8 2024.9 I also certify that prior to taking this  
10 deposition, ELDON LEAPHART was duly sworn to tell  
11 the truth pursuant to Michigan law on notarial acts  
12 55.265 Section 5(d)(i)(i).13 I further certify that I am not related to any of  
14 the parties or their attorneys or agents, nor am I an  
15 employee of any of the parties or their attorneys; and  
16 that I am not interested directly, indirectly, or  
17 financially in the matter of controversy.18  
19 

20 Megan Walter, CSR-9352

21 Core Litigation Support, LLC

22 Certified Shorthand Reporter

23 Notary Public, Oakland County, Michigan

24 My Commission expires 10/11/2024

25 Date: May 20, 2024

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***In re: Chrysler Pacifica Fire Recall Products Liability Litigation***  
**Case No. 2:22-CV-03040-DML-EAS, MDL No. 3040**

**Errata Sheet for the May 14, 2024, Deposition of Eldon Leaphart**

**ERRATA**

I, Eldon Leaphart, have read my testimony in the foregoing transcript and believe it to be true and correct with the following changes:

<b>Page / Line</b>	<b>Change</b>	<b>Reason</b>
Page 9, lines 13	“does” should be “do”	Grammar
Page 29, line 3	“I had” should be “I’ve had”	Grammar
Page 61, line 15	“pierce” should be “piece”	Mis-Spelled
Page 62, line 1	“IT” should be “IP (instrument panel)”	Incorrect
Page 69, line 9	“leases” should be “releases”	Incorrect
Page 70, line 20	“terms” should be “terms,”	Clarify
Page 73, line 13	“They were provided” should be “they provided”	Clarify
Page 90, line 8	“do do to try” should be “do, to try”	Clarify
Page 107, line 24	“fights” should be “cites”	Incorrect
Page 109, line 25	“Yelder’s” should be “Gelder’s”	Incorrect
Page 151, lines 20-21	“cause is has” should be “cause has”	Clarify
Page 154, line 10	“point is is that” should be “point is that”	Clarify
Page 165, line 24	“inconclusively” should be “conclusively”	Incorrect
Page 169, line 25	“was to the to evaluate” should be “was to evaluate”	Clarify
Page 177, line 8	“2014” should be “2017”	Incorrect
Page 208, line 14	“different” should be “differences”	Grammar
Page 222, line 22	“section 330” should be “Section 3.3”	Incorrect

  
 ELDON LEAPHART

Date: 7/2/2024